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MEMORANDUM

TO: Technical

Technical Review Committee (TRC)
Navy Installation Restoration Study
at Naval Construction Battalion Center

Davisville, RI

FROM:

Robert C. Smith, P.E.

TRC Environmental Consultants, Inc. (TRC-ECI)

DATE:

April 8, 1988

SUBJECT:

TRC Meeting (April 6, 1988)

TRC-ECI Project No. 4910-N81-51 Contract No. N62472-85-C-1026

The <u>first</u> TRC meeting for the Navy Installation Restoration (IR) Study being conducted at the Naval Construction Battalion Center (NCBC), Davisville, Rhode Island was held at NCBC on April 6, 1988. The meeting started at 13:45.

Attendees are listed on Attachment 1.

SS The command welcomed all TRC participants and indicated that the primary concern of NCBC is Allen Harbor Landfill (Site 9), although it is recognized that all identified sites that may present a risk should be considered during the IR study. It is also realized that it is important that the studies are performed in a systematic manner to ensure compliance with Federal, State and local needs.

The TRC Committee will assist in developing the Scope of Work for proposed investigations. The command believes that the study can be completed within the next 18 months and recognizes that NORTHDIV is planning to keep this project on schedule.

DS The NORTHDIV has initiated the TRC per Superfund Amendments Reauthorization Act (SARA) encouragement. The TRC will provide a forum to establish direction for the study and ensure that Federal (EPA Region 1), State (RIDEM) and local (N. Kingston, Davisville) agencies' input is considered. The TRC can also coordinate and transfer information being developed by others (especially Allen Harbor Shellfish Study, Hazard Ranking, etc.).

The public will have the opportunity to comment through other forums (public meetings, etc.)



RS The Initial Assessment Study (IAS) was performed by Fred C. Hart (1984). The IAS identified fourteen potentially contaminated sites at the NCBC. Of those, thirteen are included in the TRC-ECI Confirmation Study. Three sites of those identified in the IAS were recommended for the Confirmation Study. At the request of the Rhode Island Department of Environmental Management (RIDEM letter dated October 19, 1984), seven additional sites were added to the Confirmation Study by the Navy. Three sites were also included by the Navy to evaluate existing sampling and analytical data gathered subsequent to the IAS.

The second phase of the NACIP Program, the Confirmation Study, consists of two steps: the Verification Step and the Characterization Step. The Verification Step consists of the performance of on-site investigations to confirm or deny the presence of contamination. The Characterization Step consists of the determination of the extent of contamination (if any is present), and the recommendation of necessary corrective measures. The Field Studies were initiated during March, 1985. The Verification Step - Final Report was submitted in February, 1987. The characterization phase was postponed until SARA was adopted.

The NORTHDIV policy is to follow EPA guidance and procedures while conducting investigations and remedial action at hazardous waste sites. This policy pertains to all sites, not just those cited on the National Priorities List (NPL).

TRC-ECI is now working on the scoping effort which generally includes the following:

- Collecting existing data about the site, including previous investigations such as Preliminary Assessment (PA) and Site Investigation (SI) reports.
- · Identifying boundaries of the study area.
- Starting the identification of applicable or relevant and appropriate requirements (ARAR's).
- Identifying remedial action objectives and likely remedial action alternatives.
- Establishing data quality objectives which are statements that specify the data needed to support decisions regarding remedial actions.
- Preparing the Field Sampling Plan, the Quality Assurance/Quality Control Plan and the Health and Safety Plan.

TRC-ECI will be submitting DRAFT work plans for review in early May, 1988, will finalize plans based on comments and then develop a cost proposal for required field investigations (RI).

TRC-ECI summarized the recommendations for future site activities at NCBC, Davisville at the TRC meeting as indicated on Table 1.



TABLE 1 - SUMMARY

Site Name	Period of Operation ¹	Type of Material Disposed of 1	Recommendations for future activities
Site 2 ³ Construction Equipment Department, Battery Acid Disposal Area	1955 to 1980	Battery Acid (dilute sulfuric)	No further action, update site records, land use restrictions
Site 3 ³ Construction Equipment Department, Solvent Disposal Area	1955 to late 1970's	Paint thinners and solvents	Improve hazardous material storage, update site records, land use restrictions
Site 4 ⁵ Construction Equipment Department, Asphalt Disposal Area	1950's (one- time disposal)	Asphaltic material	No further action.
Site 5 ⁴ Transformer Oil Disposal Area	1968 or 1969 (one-time disposal)	Transformer oil containing PCB's	No further action, update site records, land use restrictions
Site 6 ³ Solvent Disposal Area North of Building 67	1970-1972	Waste solvents	No further action, update site records, land use restrictions
Site 74 Calf Pasture Point	1960-1974	 Calcium hypo- chlorite, Chloride DANC (1,3-di- chloro-5,5 dime- thyl hydantoin and acetylene chloride 	Ground water sampling and analysis, shallow excavation in area of magnetic anomaly, reevaluate environmenta and public health impacts.
Site 83 Defense Property Disposal Office, Film Processing Disposal Area	1973	Sodium thiosulfate, hydroquinone, formaldehyde, acetic acid, potassium hydroxide, sulfuric acid	No further action, update site records, land use restrictions



TABLE 1 - SUMMARY (Continued)

Site Name	Period of Operation ¹	Type of Material Disposed of 1	Recommendations for future activities
Site 9 ⁴ Allen Harbor Landfill	1946-1972	Ash, Magnitron tubes, sludge, turpentine and acetone, asbestos, paint cans, carbide, paint thinner and degreasers, jet fuel, chromic acids, trans- former oil contain- ing PCB's, cement, used mineral grit, empty 55-gallon drums, waste oil, solvents, and paint thinners.	Ground water sampling and analysis, additional soil samples at toe of landfill.
Site 10 ³ Camp Fogerty Disposal Area	1950-1970	Rifle and weapon cleaning oils and preservatives	No further action update site recor land use restrictions
Site 11 ³ Fire Fighting Training Area	1942-1955	Waste oils mixed with solvent and paint thinner	Soil sampling to determine spatial extent of DDT contamination, retevaluate environmenta and public health impacts.
Site 12 ⁵ Defense Property Disposal Office, Transformer Oil Spill Area	1977 (One time disposal)	Transformer oil containing PCB's	Remediation of PCB-contaminated cement floor.
Site 13 ³ Disposal Area Northwest of Buildings W-3, W-4, and T-1	1945-1955	Waste oils mixed with paint thinners and solvents	No further action, update site records, land use restrictions.



TABLE 1 - SUMMARY (Continued)

Site	Period of	Type of Material	Recommendations
Name	Operation ¹	Disposed of 1	for future activities ²
Site 14 ⁵ Building 38 Transformer Oil Leaks	1981	Transformer oil containing PCB's	Remediation of PCB-contaminated cement floor.

1 Data summarized from IAS report (September 1984).

² Final Verification Study Recommendation (1987).

4 IAS recommended sites for Confirmation Study.

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³ Site included in Confirmation Study at the request of Rhode Island Department of Environmental Management.

⁵ Sites included in Confirmation Study by Navy to evaluate existing analytical data.



TRC-ECI concluded that the Allen Harbor Landfill was the site that could potentially cause the most significant environmental concern of the sites studied at NCBC.

The sites to be studied in the RI/FS (as per Statement of Work) are the following:

Site No.	Description
2	CED Battery Disposal Area
3	CED Solvent Disposal Area
6	Solvent Disposal Area north of Building 67
7	Calf Pasture Point
9	Allen Harbor Landfill
10	Camp Fogerty Disposal Area
11	Fire Fighting Training Area
13	Disposal Area northwest of Building W-4

- DS Regarding Sites No. 12 and No. 14 NORTHDIV will have plans and specifications developed to remediate PCB-contaminated cement floor.

 Naval Ocean Systems Center is planning to perform an aquatic assessment of Allen Harbor. NORTHDIV will try to coordinate this study with TRC-ECI program. Probably should have them participate in TRC Committee if possible, at least to share information obtained and conclusions regarding the Harbor.
- TS In December, 1987, RIDEM wanted additional sampling in Allen Harbor. NORTHDIV went to the Corps of Engineers (COE) for the required sampling/analysis because of quick sampling and turn-around time. Results should be available in mid-May. Shellfish and sediment samples were tested for heavy metals (EP-TOX) and PCB's. The analyses will be performed at COE laboratory (Hubbards Town).
- LF COE came to NCBC in January but Allen Harbor was frozen over; they returned later to do the sampling (February/March).

Apparently, federal and state agencies are performing on-going sampling/
ralysis of shellfish in Harbor. It would be beneficial to obtain this
ata through the TRC committee. Narraganset Bay may be designated a
National Estuary. RIDEM is not sure what impact that would have on the
RI/FS study. Could affect clean-up standards.

- SS What would be the significance to NCBC, Davisville if Allen Harbor Landfill is put on the NPL?
- DS EPA Region I is ranking the site based on HRS scoring to determine if it exceeds a score of 28.5. Current EPA policy appears to be that if the score is approximately 25 but very little site specific data exists, the EPA will wait for the new ranking system (under development) and then will re-score the site. NORTHDIV believes that there is a good chance that the site will be listed since the new scoring system will put more emphasis on environmental damage.



JC EPA contractors were supposed to have ranked sites (January/February).

Both NETC, Newport and NCBC, Davisville have been ranked - understands
(based on hearsay) that both sites ranked high.

The command pointed out that there seems to be a lot of duplication in studies and NORTHDIV commented that the TRC Committee is important to ensure that transfer of information is accomplished in a timely manner.

SS What happens when you are listed as a federal facility on the NPL? What does it mean to the command and NORTHDIV?

Step 1 - proposed for NPL (USEPA). Then it becomes a potential public relations problem. SARA dictates the role of the USEPA. EPA will have the lead role, based on inter-agency agreement, to give final approval of remedy if listed. If not listed, proposed remedy will require concurrence of the State of Rhode Island.

DS NORTHDIV is required to hold Public Meetings during the RI/FS process (usually Project Initiation) after development of Scope of Work and Sampling Plan.

DOD has separate clean-up fund. However, NPL sites owned by DOD will probably have priority.

Deadlines are not designated unless the site is on the NPL. EPA to develop a reasonable time frame. Agreement signed no later than after RI/FS. If site is on the NPL - EPA can give \$50,000 to local officials and/or public interest groups.

TS If you are proposed for NPL, you have to have HTSDR perform a public health assessment.

The time table for actual listing on the NPL is not clear at this time.

- DS Are TRC-ECI recommendations (summarized above) acceptable to RIDEM?
- JC RIDEM will probably want more work on some sites recommended for no further action. For example, Site No. 2 battery acid disposal sites TRC-ECI could not locate the septic field; Site No. 5 no further action is recommended. This may not be acceptable to RIDEM. (Note: SDW includes Site No. 2.)
- RS TRC-ECI also did a baseline risk assessment as part of the verification study to support no action recommendations. However, NORTHDIV has received written comments from RIDEM since the final report submittal. All RIDEM comments are going to be incorporated into the Field Sampling Plan being developed.
- JC Has EPA given NORTHDIV any assurance that work under IR program is equivalent to an RI/FS (CERCLA guidance)?
- TS The IAS (F.C. Hart) is considered comparable to EPA-PA. The TRC-ECI Verification Step is comparable to EPA-SI. Characterization comparable to EPA-RI and part of FS.



TS Most of the proposed work program is the same as EPA requirements but there may be some EPA items that may not be addressed.

NORTHDIV has notified EPA about TRC meetings and requested by letter that they participate. Perhaps their funding or manpower is not sufficient to send a representative. NORTHDIV would certainly encourage EPA input during conduct of study.

RS TRC-ECI will have copies of DRAFT Work Plans ready by early May, 1988.

NORTHDIV will send out copies of plans to State, EPA Region I and
N. Kingston (Davisville). Tentatively, schedule the next TRC meeting in
the late May-early June timeframe.

An invitation to be on TRC Committee will be sent to NOAC by NORTHDIV.

This memorandum documents the TRC Committee Meeting (April 6, 1988) based on notes and is intended to provide a general description of items discussed. Please provide additional input or comments/changes as appropriate.

Submitted By:

TRC ENVIRONMENTAL CONSULTANTS, INC.

Robert C. Smith, P.E.

Robert C Anoth

Program Manager



ATTACHMENT 1

ATTENDEES

TECHNICAL REVIEW COMMITTEE (TRC) NAVY INSTALLATION RESTORATION STUDY AT NAVAL CONSTRUCTION BATTALION CENTER (NCBC), DAVISVILLE

	NAME	REPRESENTING	PHONE
SS	CDR Sam Saltoun	NCBC Commanding Officer	(401) 267-2193
	Lt. Don LaChance	NCBC Public Works	(401) 267-2571
	Joseph Guatieri	NCBC XO	(401) 267-2286
JC	Jeffrey Crawford	RIDEM Air & Hazardous	(401) 277-2797
TS	Tom Sheckels	NORTHDIV NAV FAC ENG COM	(215) 897-6431
	Autar Rampertaap	NORTHDIV NAV FAC ENG COM	(215) 897-6431
	Jim Valenti	NORTHDIV NAV FAC ENG COM	(215) 89 7-643 1
DS	David Smith	NORTHDIV NAV FAC ENG COM	(215) 897-6431
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